

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK

Plaintiffs #1-21, individually and on behalf
of all others similarly situated,

Plaintiffs,

v.

COUNTY OF SUFFOLK; SUFFOLK COUNTY
POLICE DEPARTMENT; EDWARD WEBBER,
individually and in his official capacity; MILAGROS
SOTO, individually and in her official capacity;
SCOTT GREENE, individually and in his official
capacity; BRIDGETT DORMER, individually and in
her official capacity; SUPERVISORY JOHN DOE
DEFENDANTS, individually and in their official
capacities; and JOHN DOE DEFENDANTS,
individually and in their official capacities,

Defendants.

Case No.: 2:15-cv-02431-WFK-LB

**PLAINTIFFS' OBJECTIONS TO COUNTY DEFENDANTS'
PROPOSED JURY INSTRUCTIONS AND VERDICT FORM**

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July 22, 2022

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Pursuant to the Court's Pre-Trial Scheduling Order dated August 23, 2021 (ECF No. 325) and Paragraph V.B.2 of the Court's Individual Practices, Plaintiffs #1-20 ("Plaintiffs") respectfully submit their objections to Defendants' Request to Charge Jury (ECF No. 393), which are attached hereto in table form as Exhibit A, and their objections to Defendants' Proposed Verdict Sheet (ECF No. 399), which are attached hereto in table form as Exhibit B.

After reviewing County Defendants' proposed verdict form, Plaintiffs agree that it is appropriate to use a simpler and more general verdict form than the one previously proposed by Plaintiffs. A more streamlined and less detailed verdict form will reduce the likelihood of juror confusion and potential error. While Plaintiffs agree that the length and simplicity of County Defendants' proposed verdict form is generally appropriate, Plaintiffs object to the order of County Defendants' proposed verdict questions and how certain questions are phrased, as explained in further detail in Exhibit B. Consistent with this approach, Plaintiffs have adapted their prior verdict form into a simpler and more streamlined format. Accordingly, Plaintiffs' Amended Proposed Verdict Form is attached hereto as Exhibit C. Pages 1 through 8 contain a simplified verdict form designed for each Named Plaintiff's claims and Pages 9 through 15 contain a simplified verdict form for Plaintiffs' class claims, for which County Defendants did not include any questions in their proposed verdict form.

Plaintiffs reserve the right to amend, supplement, revise or replace their objections and Plaintiffs' Amended Proposed Verdict Form as may be necessary based on the outcome of various pending and anticipated pre-trial motions, any rulings the Court may render in charging conferences or during the course of the trial, and/or the evidence actually adduced at trial, as permitted by the Court.

Dated: July 22, 2022
New York, New York

By: /s/ Jose Perez
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